IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA CENTRAL DIVISION

UNITED STATES OF AMERICA,

No. 24-CR-03015

Plaintiff,

INDICTMENT

vs.

Count 1
18 U.S.C. § 2261A(2):
Cyberstalking

SHANINTH MICHAEL RAY,

Defendant.

The Grand Jury charges:

Count 1 Cyberstalking

Between about April 2023, and continuing through on or about October 4, 2023, defendant SHANINTH MICHAEL RAY, with the intent to kill, injure, harass, intimidate, place in reasonable fear of death and serious bodily injury, and cause substantial emotional distress to a person in another state, namely, K.T. and members of K.T.'s immediate family who were all located in the Northern District of Iowa, used facilities of interstate or foreign commerce, namely forms of interactive computer service and electronic communication, including a cellular phone, TextNow, and Facebook, to engage in a course of conduct that placed K.T. and K.T.'s immediate family members in reasonable fear of death and serious bodily injury and caused substantial emotional distress to K.T. and K.T.'s immediate family members.

This was in violation of Title 18, United States Code, Section 2261A(2).

A TRUE BILL

Grand Jury Foreperson Date

TIMOTHY T. DUAX United States Attorney

By: For TIMMONS

Assistant United States Attorney

PRESENTED IN OPEN COURT
BY THE
FOREMAN OF THE GRAND JURY

And filed 3-13-7074
PAUL DE YOUNG, CLERK